

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

CATHERINE ALEXANDER,

Plaintiff,

vs.

No. 3:18-cv-966-MJR-DGW

TAKE-TWO INTERACTIVE SOFTWARE, INC.,
2K GAMES, INC.; 2K SPORTS, INC.; WORLD
WRESTLING ENTERTAINMENT, INC.;
VISUAL CONCEPTS ENTERTAINMENT;
YUKE'S CO., LTD.; AND YUKE'S LA, INC.,

Defendants.

VIDEOTAPED DEPOSITION OF

CATHERINE ALEXANDER

January 15, 2019

Belleville, Illinois

Reported by:

Pamela Harrison

Job no: 24082

1 say you called WWE?

2 A Faux sleeves.

3 MR. SIMON: I think that's F-A-U-X.

4 THE WITNESS: Yes.

5 QUESTIONS BY MS. CENDALI:

6 Q And those are -- what are faux sleeves?

7 A Like a nylon material with the tattoos
8 printed on them that you would pull off -- or pull
9 on so it would depict you having those tattoos.

10 Q So in faux sleeves, that's not a situation
11 where a -- where Mr. Orton, for example, would be
12 depicted himself as he really looks with his
13 tattoos. That would be a situation where a fan or
14 someone else would use these sleeves to put the
15 tattoos on themselves; is that right?

16 A Yes. A reproduction.

17 Q Okay. Was there any other kind of product
18 that you had in mind?

19 A No, ma'am.

20 Q Okay. And do you know whether these faux
21 sleeves had ever come out?

22 A Not to my knowledge.

23 Q So other than the tattoos -- the use of the
24 tattoos in the WWE 2K video games depicting

1 Mr. Orton, are you aware of any other instance where
2 you believe your rights with regard to the tattoos
3 you inked on Mr. Orton were infringed?

4 A I'm not familiar enough to answer properly.

5 Q But sitting here today, you don't know of
6 anything?

7 A No, ma'am.

8 Q Okay. So someone mentioned to you that
9 there might be faux sleeves; is that right?

10 A Yes, ma'am.

11 Q And was this in or about 2009?

12 A Yes, ma'am.

13 Q And was this a client at the tattoo parlor
14 you were working at?

15 A I don't recall if it was a client, a friend
16 of a client. I don't know.

17 Q So you have no recollection of who said this
18 to you at this point?

19 A No, ma'am.

20 Q And how did you go about finding a number to
21 contact WWE?

22 A I believe I Googled it.

23 Q Okay. What number do you recall calling?

24 A I don't recall.

1 Q And you say you got the number for WWE legal
2 in Connecticut; is that right?

3 A Yes, ma'am.

4 Q Okay. So -- and you say you called that
5 number; is that right?

6 A Yes, ma'am.

7 Q So what happened after you called the
8 number?

9 A During the discussion?

10 Q Yes. Did you -- were you put in touch with
11 somebody at WWE legal, or did you speak to a
12 receptionist or answering -- someone who answered
13 the phone at the company?

14 Let's put it this way: Who did you speak to
15 at WWE?

16 A To my understanding, it was an authority of
17 legal matters for WWE.

18 Q Okay. Well, what was that based on?

19 A Our conversation.

20 Q Okay. Well, what happened when you called
21 the number? Did someone answer the phone, and was
22 that the person you spoke to, or were you
23 transferred to someone else?

24 A I don't recall at this time.

1 QUESTIONS BY MS. CENDALI:

2 Q I'm asking: When you did this Google search
3 you say, did you come up with a specific number for
4 WWE legal or a number for WWE in general?

5 A WWE legal, Stamford, Connecticut, with the
6 ZIP code. There was no name attached.

7 Q Okay. And you didn't write down the name of
8 the person you spoke with, right?

9 A No, ma'am.

10 Q And can you please tell me everything you
11 can about what you said and what the person said to
12 you in this conversation?

13 A I introduced myself. I stated that I am
14 Randy Orton's tattoo artist. I stated the faux
15 sleeves that we discussed. I asked if this was
16 indeed a factual product. I was willing to, if they
17 wanted to use the images, negotiate a percentage of
18 any reproductions of my work that they may want to
19 create.

20 The person laughed at me and said I had no
21 grounds, and they could do what they want with his
22 images. He is their wrestler.

23 Q And did the person cite any law, or did you
24 have any conversations about legal bases?

1 A No, ma'am.

2 Q And do you recall what you said back to the
3 person?

4 A I said that it would only be fair, I'm sorry
5 that they feel that way, and that I was sorry that
6 they assumed I was a stupid hick from the Midwest
7 that doesn't know any better.

8 Q Did they tell you you're a stupid hick from
9 the Midwest who doesn't know any better?

10 A The tone implied to me that was how I was
11 being spoken to.

12 Q But no one from WWE said you were a stupid
13 hick from the Midwest, I take it, right?

14 A Not directly.

15 Q And you don't remember who this conversation
16 was? It sounds like it was an important
17 conversation to you, right?

18 A It was.

19 Q Yet you didn't write down the person's name;
20 is that true?

21 MR. SIMON: Object to the form. Asked and
22 answered.

23 Go ahead.

24 A No, I did not.